

# EXHIBIT A

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August 5, 2024

**VIA CERTIFIED U.S. MAIL**

The Honorable Merrick B. Garland  
 Attorney General of the United States  
 U.S. Department of Justice  
 950 Pennsylvania Avenue, NW  
 Washington, DC 20530-0001

Re: Notice of Class Action Settlement Pursuant to 28 U.S.C. § 1715  
*In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW  
*Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW  
*Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS

Dear Attorney General:

Pursuant to the Class Action Fairness Act of 2005 ("CAFA"), 28 U.S.C. § 1715, we write on behalf of Defendants National Collegiate Athletic Association ("NCAA"), Pac-12 Conference ("Pac-12"), The Big Ten Conference, Inc. ("Big Ten"), The Big 12 Conference, Inc. ("Big 12"), Southeastern Conference ("SEC"), and the Atlantic Coast Conference ("ACC") (collectively, "Defendants") to provide the following notification of the proposed settlements in *In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW (N.D. Cal.) ("*House*"), *Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW (N.D. Cal.) ("*Hubbard*"), and *Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS ("*Carter*," and collectively with *House* and *Hubbard*, the "Federal Actions").

Enclosed is a CD containing the following information in a PDF format:

1. **28 U.S.C. § 1715(b)(1) – Complaints:**

- The Class Action Complaint (ECF No. 1), Consolidated Amended Complaint (ECF No. 164), and Second Consolidated Amended Class Action Complaint (ECF No. 448-1), filed as Exhibit 1 to the Stipulation with Proposed Order Regarding Filing of Second Consolidated Amended Class Action Complaint (ECF No. 448), filed in *House*.
- The Complaint (ECF No. 1) filed in *Hubbard*.

- The Complaint (ECF No. 1) filed in *Carter*.
2. **28 U.S.C. § 1715(b)(2) – Notice of any Scheduled Judicial Hearings:** Plaintiffs in *House* and *Hubbard* noticed a settlement hearing for September 5, 2024. (*House* ECF No. 450; *Hubbard* ECF No. 227). On July 30, 2024, those plaintiffs filed an Unopposed Administrative Motion to Shorten Time Pursuant to Civil Local Rule 6-3 For the Hearing Of Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement (*House* ECF No. 451; *Hubbard* ECF No. 228), requesting to advance the noticed hearing date from September 5, 2024 to August 12, 13, 14 or August 19, 20, 21, or 22, 2024.
3. **28 U.S.C. § 1715 (b)(3) and (b)(4) – Proposed Notification to Class Members and Class Action Settlement Agreements:**
- The *House* Plaintiffs’ Unopposed Motion for Preliminary Settlement Approval (ECF No. 450), submitted to the District Court on July 26, 2024, as well as the Stipulation of Settlement (Exhibit 1 to the Declaration of Steve W. Berman (ECF No. 450-2), ECF No. 450-3), with the following exhibits:
    - [Proposed] Order (ECF No. 450-1);
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    - Declaration of Carla A. Peak Regarding Settlement Notice Program (ECF No. 227-6).
4. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreements:** None.
5. **28 U.S.C. § 1715(b)(6) – Final Judgment:** None.
6. **28 U.S.C. § 1715(b)(7) – Estimate of Class Members:** The names and residences of all of the class members will not be known until after notice of the settlement is given and potential class members submit a Proof of Claim and Release. Accordingly, it is not feasible at this time to provide a list of class members by state of residence, a reasonable estimate of the number of class members residing in each state, or a reasonable estimate of the proportionate share of claims of class members residing in each state to the entire settlement. We respectfully refer any further inquiries regarding the potential class members to Verita Global, LLC (the

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“Settlement Administrator”), which is working to collect information regarding potential class members in order to provide such members with notice of the Stipulation of Settlement.

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The foregoing information is provided based on the information currently available to Defendants and is based on the status of the proceedings at the time of the submission of this notification. Should you have any questions, please do not hesitate to contact us.

Respectfully submitted,

s/ Christopher S. Yates

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August 5, 2024

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Office of the Attorney General  
 501 Washington Avenue  
 Montgomery, AL 36104

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4. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreements:** None.

5. **28 U.S.C. § 1715(b)(6) – Final Judgment:** None.

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Respectfully submitted,

s/ Christopher S. Yates

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*Attorney for Defendant The Big 12 Conference, Inc.*

s/ Robert W. Fuller

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*Attorney for Defendant The Big Ten Conference, Inc.*

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Attorney General Treg Taylor  
 1031 West 4th Avenue, Suite 200  
 Anchorage, AK 99501

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s/ Christopher S. Yates

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s/ Natali Wyson

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*Attorney for Defendant The Big Ten Conference, Inc.*

s/ Rakesh Kilaru

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Attorney General Kris Mayes  
 Phoenix Office  
 2005 N Central Ave  
 Phoenix, AZ 85004-2926

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4. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreements:** None.
5. **28 U.S.C. § 1715(b)(6) – Final Judgment:** None.
6. **28 U.S.C. § 1715(b)(7) – Estimate of Class Members:** The names and residences of all of the class members will not be known until after notice of the settlement is given and potential class members submit a Proof of Claim and Release. Accordingly, it is not feasible at this time to provide a list of class members by state of residence, a reasonable estimate of the number of class members residing in each state, or a reasonable estimate of the proportionate share of claims of class members residing in each state to the entire settlement. We respectfully refer any further inquiries regarding the potential class members to Verita Global, LLC (the

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“Settlement Administrator”), which is working to collect information regarding potential class members in order to provide such members with notice of the Stipulation of Settlement.

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The foregoing information is provided based on the information currently available to Defendants and is based on the status of the proceedings at the time of the submission of this notification. Should you have any questions, please do not hesitate to contact us.

Respectfully submitted,

s/ Christopher S. Yates

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August 5, 2024

## VIA CERTIFIED U.S. MAIL

Attorney General Tim Griffin  
 323 Center Street, Suite 200  
 Little Rock, AR 72201

Re: Notice of Class Action Settlement Pursuant to 28 U.S.C. § 1715  
*In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW  
*Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW  
*Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS

Dear Attorney General:

Pursuant to the Class Action Fairness Act of 2005 (“CAFA”), 28 U.S.C. § 1715, we write on behalf of Defendants National Collegiate Athletic Association (“NCAA”), Pac-12 Conference (“Pac-12”), The Big Ten Conference, Inc. (“Big Ten”), The Big 12 Conference, Inc. (“Big 12”), Southeastern Conference (“SEC”), and the Atlantic Coast Conference (“ACC”) (collectively, “Defendants”) to provide the following notification of the proposed settlements in *In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW (N.D. Cal.) (“*House*”), *Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW (N.D. Cal.) (“*Hubbard*”), and *Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS (“*Carter*,” and collectively with *House* and *Hubbard*, the “Federal Actions”).

Enclosed is a CD containing the following information in a PDF format:

### 1. **28 U.S.C. § 1715(b)(1) – Complaints:**

- The Class Action Complaint (ECF No. 1), Consolidated Amended Complaint (ECF No. 164), and Second Consolidated Amended Class Action Complaint (ECF No. 448-1), filed as Exhibit 1 to the Stipulation with Proposed Order Regarding Filing of Second Consolidated Amended Class Action Complaint (ECF No. 448), filed in *House*.
- The Complaint (ECF No. 1) filed in *Hubbard*.
- The Complaint (ECF No. 1) filed in *Carter*.



2. **28 U.S.C. § 1715(b)(2) – Notice of any Scheduled Judicial Hearings:** Plaintiffs in *House* and *Hubbard* noticed a settlement hearing for September 5, 2024. (*House* ECF No. 450; *Hubbard* ECF No. 227). On July 30, 2024, those plaintiffs filed an Unopposed Administrative Motion to Shorten Time Pursuant to Civil Local Rule 6-3 For the Hearing Of Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement (*House* ECF No. 451; *Hubbard* ECF No. 228), requesting to advance the noticed hearing date from September 5, 2024 to August 12, 13, 14 or August 19, 20, 21, or 22, 2024.

3. **28 U.S.C. § 1715 (b)(3) and (b)(4) – Proposed Notification to Class Members and Class Action Settlement Agreements:**

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4. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreements:** None.

5. **28 U.S.C. § 1715(b)(6) – Final Judgment:** None.

6. **28 U.S.C. § 1715(b)(7) – Estimate of Class Members:** The names and residences of all of the class members will not be known until after notice of the settlement is given and potential class members submit a Proof of Claim and Release. Accordingly, it is not feasible at this time to provide a list of class members by state of residence, a reasonable estimate of the number of class members residing in each state, or a reasonable estimate of the proportionate share of claims of class members residing in each state to the entire settlement. We respectfully refer any further inquiries regarding the potential class members to Verita Global, LLC (the “Settlement Administrator”), which is working to collect information regarding potential class members in order to provide such members with notice of the Stipulation of Settlement.

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The foregoing information is provided based on the information currently available to Defendants and is based on the status of the proceedings at the time of the submission of this notification. Should you have any questions, please do not hesitate to contact us.

Respectfully submitted,

s/ Christopher S. Yates

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August 5, 2024

### VIA CERTIFIED U.S. MAIL

Office of the Attorney General  
 1300 "I" Street  
 Sacramento, CA 95814-2919

Re: Notice of Class Action Settlement Pursuant to 28 U.S.C. § 1715  
*In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW  
*Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW  
*Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS

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s/ Christopher S. Yates

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August 5, 2024

### VIA CERTIFIED U.S. MAIL

Office of the Attorney General  
 Colorado Department of Law  
 Ralph L. Carr Judicial Building  
 1300 Broadway, 10th Floor  
 Denver, CO 80203

Re: Notice of Class Action Settlement Pursuant to 28 U.S.C § 1715  
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August 5, 2024

### VIA CERTIFIED U.S. MAIL

Office of the Attorney General  
 165 Capitol Avenue  
 Hartford, CT 06106

Re: Notice of Class Action Settlement Pursuant to 28 U.S.C. § 1715  
*In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW  
*Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW  
*Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS

Dear Attorney General:

Pursuant to the Class Action Fairness Act of 2005 (“CAFA”), 28 U.S.C. § 1715, we write on behalf of Defendants National Collegiate Athletic Association (“NCAA”), Pac-12 Conference (“Pac-12”), The Big Ten Conference, Inc. (“Big Ten”), The Big 12 Conference, Inc. (“Big 12”), Southeastern Conference (“SEC”), and the Atlantic Coast Conference (“ACC”) (collectively, “Defendants”) to provide the following notification of the proposed settlements in *In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW (N.D. Cal.) (“*House*”), *Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW (N.D. Cal.) (“*Hubbard*”), and *Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS (“*Carter*,” and collectively with *House* and *Hubbard*, the “Federal Actions”).

Enclosed is a CD containing the following information in a PDF format:

#### 1. 28 U.S.C. § 1715(b)(1) – Complaints:

- The Class Action Complaint (ECF No. 1), Consolidated Amended Complaint (ECF No. 164), and Second Consolidated Amended Class Action Complaint (ECF No. 448-1), filed as Exhibit 1 to the Stipulation with Proposed Order Regarding Filing of Second Consolidated Amended Class Action Complaint (ECF No. 448), filed in *House*.
- The Complaint (ECF No. 1) filed in *Hubbard*.
- The Complaint (ECF No. 1) filed in *Carter*.

2. **28 U.S.C. § 1715(b)(2) – Notice of any Scheduled Judicial Hearings:** Plaintiffs in *House* and *Hubbard* noticed a settlement hearing for September 5, 2024. (*House* ECF No. 450; *Hubbard* ECF No. 227). On July 30, 2024, those plaintiffs filed an Unopposed Administrative Motion to Shorten Time Pursuant to Civil Local Rule 6-3 For the Hearing Of Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement (*House* ECF No. 451; *Hubbard* ECF No. 228), requesting to advance the noticed hearing date from September 5, 2024 to August 12, 13, 14 or August 19, 20, 21, or 22, 2024.

3. **28 U.S.C. § 1715 (b)(3) and (b)(4) – Proposed Notification to Class Members and Class Action Settlement Agreements:**

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4. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreements:** None.

5. **28 U.S.C. § 1715(b)(6) – Final Judgment:** None.

6. **28 U.S.C. § 1715(b)(7) – Estimate of Class Members:** The names and residences of all of the class members will not be known until after notice of the settlement is given and potential class members submit a Proof of Claim and Release. Accordingly, it is not feasible at this time to provide a list of class members by state of residence, a reasonable estimate of the number of class members residing in each state, or a reasonable estimate of the proportionate share of claims of class members residing in each state to the entire settlement. We respectfully refer any further inquiries regarding the potential class members to Verita Global, LLC (the “Settlement Administrator”), which is working to collect information regarding potential class members in order to provide such members with notice of the Stipulation of Settlement.



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The foregoing information is provided based on the information currently available to Defendants and is based on the status of the proceedings at the time of the submission of this notification. Should you have any questions, please do not hesitate to contact us.

Respectfully submitted,

s/ Christopher S. Yates

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s/ Robert W. Fuller

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August 5, 2024

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Office of the Attorney General  
 400 6th Street NW  
 Washington, D.C. 20001

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Dear Attorney General:

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4. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreements:** None.

5. **28 U.S.C. § 1715(b)(6) – Final Judgment:** None.

6. **28 U.S.C. § 1715(b)(7) – Estimate of Class Members:** The names and residences of all of the class members will not be known until after notice of the settlement is given and potential class members submit a Proof of Claim and Release. Accordingly, it is not feasible at this time to provide a list of class members by state of residence, a reasonable estimate of the number of class members residing in each state, or a reasonable estimate of the proportionate share of claims of class members residing in each state to the entire settlement. We respectfully refer any further inquiries regarding the potential class members to Verita Global, LLC (the “Settlement Administrator”), which is working to collect information regarding potential class members in order to provide such members with notice of the Stipulation of Settlement.

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Respectfully submitted,

s/ Christopher S. Yates

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August 5, 2024

**VIA CERTIFIED U.S. MAIL**

Delaware Department of Justice  
 Carvel State Building  
 820 N. French St.  
 Wilmington, DE 19801

Re: Notice of Class Action Settlement Pursuant to 28 U.S.C § 1715  
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s/ Christopher S. Yates

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s/ Natali Wyson

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August 5, 2024

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Office of the Attorney General Ashley Moody  
 PL-01, The Capitol  
 Tallahassee, FL 32399-1050

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2. **28 U.S.C. § 1715(b)(2) – Notice of any Scheduled Judicial Hearings:** Plaintiffs in *House* and *Hubbard* noticed a settlement hearing for September 5, 2024. (*House* ECF No. 450; *Hubbard* ECF No. 227). On July 30, 2024, those plaintiffs filed an Unopposed Administrative Motion to Shorten Time Pursuant to Civil Local Rule 6-3 For the Hearing Of Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement (*House* ECF No. 451; *Hubbard* ECF No. 228), requesting to advance the noticed hearing date from September 5, 2024 to August 12, 13, 14 or August 19, 20, 21, or 22, 2024.

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4. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreements:** None.

5. **28 U.S.C. § 1715(b)(6) – Final Judgment:** None.

6. **28 U.S.C. § 1715(b)(7) – Estimate of Class Members:** The names and residences of all of the class members will not be known until after notice of the settlement is given and potential class members submit a Proof of Claim and Release. Accordingly, it is not feasible at this time to provide a list of class members by state of residence, a reasonable estimate of the number of class members residing in each state, or a reasonable estimate of the proportionate share of claims of class members residing in each state to the entire settlement. We respectfully refer any further inquiries regarding the potential class members to Verita Global, LLC (the “Settlement Administrator”), which is working to collect information regarding potential class members in order to provide such members with notice of the Stipulation of Settlement.

**LATHAM & WATKINS** LLP

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The foregoing information is provided based on the information currently available to Defendants and is based on the status of the proceedings at the time of the submission of this notification. Should you have any questions, please do not hesitate to contact us.

Respectfully submitted,

s/ Christopher S. Yates

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August 5, 2024

**VIA CERTIFIED U.S. MAIL**

Office of the Attorney General  
 47 Trinity Street, SW  
 Atlanta, GA 30334

Re: Notice of Class Action Settlement Pursuant to 28 U.S.C. § 1715  
*In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW  
*Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW  
*Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS

Dear Attorney General:

Pursuant to the Class Action Fairness Act of 2005 ("CAFA"), 28 U.S.C. § 1715, we write on behalf of Defendants National Collegiate Athletic Association ("NCAA"), Pac-12 Conference ("Pac-12"), The Big Ten Conference, Inc. ("Big Ten"), The Big 12 Conference, Inc. ("Big 12"), Southeastern Conference ("SEC"), and the Atlantic Coast Conference ("ACC") (collectively, "Defendants") to provide the following notification of the proposed settlements in *In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW (N.D. Cal.) ("*House*"), *Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW (N.D. Cal.) ("*Hubbard*"), and *Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS ("*Carter*," and collectively with *House* and *Hubbard*, the "Federal Actions").

Enclosed is a CD containing the following information in a PDF format:

1. **28 U.S.C. § 1715(b)(1) – Complaints:**

- The Class Action Complaint (ECF No. 1), Consolidated Amended Complaint (ECF No. 164), and Second Consolidated Amended Class Action Complaint (ECF No. 448-1), filed as Exhibit 1 to the Stipulation with Proposed Order Regarding Filing of Second Consolidated Amended Class Action Complaint (ECF No. 448), filed in *House*.
- The Complaint (ECF No. 1) filed in *Hubbard*.
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4. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreements:** None.

5. **28 U.S.C. § 1715(b)(6) – Final Judgment:** None.

6. **28 U.S.C. § 1715(b)(7) – Estimate of Class Members:** The names and residences of all of the class members will not be known until after notice of the settlement is given and potential class members submit a Proof of Claim and Release. Accordingly, it is not feasible at this time to provide a list of class members by state of residence, a reasonable estimate of the number of class members residing in each state, or a reasonable estimate of the proportionate share of claims of class members residing in each state to the entire settlement. We respectfully refer any further inquiries regarding the potential class members to Verita Global, LLC (the “Settlement Administrator”), which is working to collect information regarding potential class members in order to provide such members with notice of the Stipulation of Settlement.

**LATHAM & WATKINS** LLP

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The foregoing information is provided based on the information currently available to Defendants and is based on the status of the proceedings at the time of the submission of this notification. Should you have any questions, please do not hesitate to contact us.

Respectfully submitted,

s/ Christopher S. Yates

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August 5, 2024

## VIA CERTIFIED U.S. MAIL

Department of the Attorney General  
 425 Queen Street  
 Honolulu, HI 96813

Re: Notice of Class Action Settlement Pursuant to 28 U.S.C § 1715  
*In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW  
*Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW  
*Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS

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Respectfully submitted,

s/ Christopher S. Yates

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August 5, 2024

## VIA CERTIFIED U.S. MAIL

Office of the Attorney General  
 700 W. Jefferson Street, Suite 210  
 P.O. Box 83720  
 Boise, ID 83720-0010

Re: Notice of Class Action Settlement Pursuant to 28 U.S.C § 1715  
*In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW  
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August 5, 2024

**VIA CERTIFIED U.S. MAIL**

Office of the Illinois Attorney General  
 500 South Second Street  
 Springfield, IL 62701

Re: Notice of Class Action Settlement Pursuant to 28 U.S.C § 1715  
*In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW  
*Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW  
*Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS

Dear Attorney General:

Pursuant to the Class Action Fairness Act of 2005 (“CAFA”), 28 U.S.C. § 1715, we write on behalf of Defendants National Collegiate Athletic Association (“NCAA”), Pac-12 Conference (“Pac-12”), The Big Ten Conference, Inc. (“Big Ten”), The Big 12 Conference, Inc. (“Big 12”), Southeastern Conference (“SEC”), and the Atlantic Coast Conference (“ACC”) (collectively, “Defendants”) to provide the following notification of the proposed settlements in *In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW (N.D. Cal.) (“*House*”), *Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW (N.D. Cal.) (“*Hubbard*”), and *Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS (“*Carter*,” and collectively with *House* and *Hubbard*, the “Federal Actions”).

Enclosed is a CD containing the following information in a PDF format:

1. **28 U.S.C. § 1715(b)(1) – Complaints:**

- The Class Action Complaint (ECF No. 1), Consolidated Amended Complaint (ECF No. 164), and Second Consolidated Amended Class Action Complaint (ECF No. 448-1), filed as Exhibit 1 to the Stipulation with Proposed Order Regarding Filing of Second Consolidated Amended Class Action Complaint (ECF No. 448), filed in *House*.
- The Complaint (ECF No. 1) filed in *Hubbard*.
- The Complaint (ECF No. 1) filed in *Carter*.

2. **28 U.S.C. § 1715(b)(2) – Notice of any Scheduled Judicial Hearings:** Plaintiffs in *House* and *Hubbard* noticed a settlement hearing for September 5, 2024. (*House* ECF No. 450; *Hubbard* ECF No. 227). On July 30, 2024, those plaintiffs filed an Unopposed Administrative Motion to Shorten Time Pursuant to Civil Local Rule 6-3 For the Hearing Of Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement (*House* ECF No. 451; *Hubbard* ECF No. 228), requesting to advance the noticed hearing date from September 5, 2024 to August 12, 13, 14 or August 19, 20, 21, or 22, 2024.

3. **28 U.S.C. § 1715 (b)(3) and (b)(4) – Proposed Notification to Class Members and Class Action Settlement Agreements:**

- The *House* Plaintiffs’ Unopposed Motion for Preliminary Settlement Approval (ECF No. 450), submitted to the District Court on July 26, 2024, as well as the Stipulation of Settlement (Exhibit 1 to the Declaration of Steve W. Berman (ECF No. 450-2), ECF No. 450-3), with the following exhibits:
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4. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreements:** None.

5. **28 U.S.C. § 1715(b)(6) – Final Judgment:** None.

6. **28 U.S.C. § 1715(b)(7) – Estimate of Class Members:** The names and residences of all of the class members will not be known until after notice of the settlement is given and potential class members submit a Proof of Claim and Release. Accordingly, it is not feasible at this time to provide a list of class members by state of residence, a reasonable estimate of the number of class members residing in each state, or a reasonable estimate of the proportionate share of claims of class members residing in each state to the entire settlement. We respectfully refer any further inquiries regarding the potential class members to Verita Global, LLC (the “Settlement Administrator”), which is working to collect information regarding potential class members in order to provide such members with notice of the Stipulation of Settlement.



LATHAM & WATKINS<sup>LLP</sup>

7. **28 U.S.C. § 1715(b)(8) – Judicial Opinions Related to the Settlement:** The Court granted the *House* Plaintiffs’ Unopposed Motion for Certification of Injunctive Relief Class on September 22, 2023 (*House* ECF No. 323), granted the *House* Plaintiffs’ Motion for Certification of Damages Classes on November 3, 2023 (*House* ECF No. 387), and issued an Order Granting the *House* Plaintiffs’ Motion to Approve Manner and Form of Class Notice (as Modified) on March 1, 2024 (*House* ECF No. 406).

The foregoing information is provided based on the information currently available to Defendants and is based on the status of the proceedings at the time of the submission of this notification. Should you have any questions, please do not hesitate to contact us.

Respectfully submitted,

s/ Christopher S. Yates

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August 5, 2024

### VIA CERTIFIED U.S. MAIL

Office of the Indiana Attorney General  
 Indiana Government Center South  
 302 W. Washington St., 5th Floor  
 Indianapolis, IN 46204

Re: Notice of Class Action Settlement Pursuant to 28 U.S.C. § 1715  
*In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW  
*Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW  
*Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS

Dear Attorney General:

Pursuant to the Class Action Fairness Act of 2005 ("CAFA"), 28 U.S.C. § 1715, we write on behalf of Defendants National Collegiate Athletic Association ("NCAA"), Pac-12 Conference ("Pac-12"), The Big Ten Conference, Inc. ("Big Ten"), The Big 12 Conference, Inc. ("Big 12"), Southeastern Conference ("SEC"), and the Atlantic Coast Conference ("ACC") (collectively, "Defendants") to provide the following notification of the proposed settlements in *In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW (N.D. Cal.) ("*House*"), *Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW (N.D. Cal.) ("*Hubbard*"), and *Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS ("*Carter*," and collectively with *House* and *Hubbard*, the "Federal Actions").

Enclosed is a CD containing the following information in a PDF format:

1. **28 U.S.C. § 1715(b)(1) – Complaints:**

- The Class Action Complaint (ECF No. 1), Consolidated Amended Complaint (ECF No. 164), and Second Consolidated Amended Class Action Complaint (ECF No. 448-1), filed as Exhibit 1 to the Stipulation with Proposed Order Regarding Filing of Second Consolidated Amended Class Action Complaint (ECF No. 448), filed in *House*.
- The Complaint (ECF No. 1) filed in *Hubbard*.

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2. **28 U.S.C. § 1715(b)(2) – Notice of any Scheduled Judicial Hearings:** Plaintiffs in *House* and *Hubbard* noticed a settlement hearing for September 5, 2024. (*House* ECF No. 450; *Hubbard* ECF No. 227). On July 30, 2024, those plaintiffs filed an Unopposed Administrative Motion to Shorten Time Pursuant to Civil Local Rule 6-3 For the Hearing Of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement (*House* ECF No. 451; *Hubbard* ECF No. 228), requesting to advance the noticed hearing date from September 5, 2024 to August 12, 13, 14 or August 19, 20, 21, or 22, 2024.

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4. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreements:** None.

5. **28 U.S.C. § 1715(b)(6) – Final Judgment:** None.

6. **28 U.S.C. § 1715(b)(7) – Estimate of Class Members:** The names and residences of all of the class members will not be known until after notice of the settlement is given and potential class members submit a Proof of Claim and Release. Accordingly, it is not feasible at this time to provide a list of class members by state of residence, a reasonable estimate of the number of class members residing in each state, or a reasonable estimate of the proportionate share of claims of class members residing in each state to the entire settlement. We respectfully refer any further inquiries regarding the potential class members to Verita Global, LLC (the

LATHAM & WATKINS LLP

“Settlement Administrator”), which is working to collect information regarding potential class members in order to provide such members with notice of the Stipulation of Settlement.

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The foregoing information is provided based on the information currently available to Defendants and is based on the status of the proceedings at the time of the submission of this notification. Should you have any questions, please do not hesitate to contact us.

Respectfully submitted,

s/ Christopher S. Yates

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August 5, 2024

## VIA CERTIFIED U.S. MAIL

Attorney General Brenna Bird  
 Hoover State Office Building  
 1305 E. Walnut Street  
 Des Moines, IA 50319

Re: Notice of Class Action Settlement Pursuant to 28 U.S.C § 1715  
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4. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreements:** None.
5. **28 U.S.C. § 1715(b)(6) – Final Judgment:** None.
6. **28 U.S.C. § 1715(b)(7) – Estimate of Class Members:** The names and residences of all of the class members will not be known until after notice of the settlement is given and potential class members submit a Proof of Claim and Release. Accordingly, it is not feasible at this time to provide a list of class members by state of residence, a reasonable estimate of the number of class members residing in each state, or a reasonable estimate of the proportionate share of claims of class members residing in each state to the entire settlement. We respectfully refer any further inquiries regarding the potential class members to Verita Global, LLC (the



LATHAM & WATKINS<sup>LLP</sup>

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Respectfully submitted,

s/ Christopher S. Yates

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August 5, 2024

**VIA CERTIFIED U.S. MAIL**

Attorney General Kris W. Kobach  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612

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*Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS

Dear Attorney General:

Pursuant to the Class Action Fairness Act of 2005 (“CAFA”), 28 U.S.C. § 1715, we write on behalf of Defendants National Collegiate Athletic Association (“NCAA”), Pac-12 Conference (“Pac-12”), The Big Ten Conference, Inc. (“Big Ten”), The Big 12 Conference, Inc. (“Big 12”), Southeastern Conference (“SEC”), and the Atlantic Coast Conference (“ACC”) (collectively, “Defendants”) to provide the following notification of the proposed settlements in *In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW (N.D. Cal.) (“*House*”), *Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW (N.D. Cal.) (“*Hubbard*”), and *Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS (“*Carter*,” and collectively with *House* and *Hubbard*, the “Federal Actions”).

Enclosed is a CD containing the following information in a PDF format:

1. **28 U.S.C. § 1715(b)(1) – Complaints:**

- The Class Action Complaint (ECF No. 1), Consolidated Amended Complaint (ECF No. 164), and Second Consolidated Amended Class Action Complaint (ECF No. 448-1), filed as Exhibit 1 to the Stipulation with Proposed Order Regarding Filing of Second Consolidated Amended Class Action Complaint (ECF No. 448), filed in *House*.
- The Complaint (ECF No. 1) filed in *Hubbard*.
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2. **28 U.S.C. § 1715(b)(2) – Notice of any Scheduled Judicial Hearings:** Plaintiffs in *House* and *Hubbard* noticed a settlement hearing for September 5, 2024. (*House* ECF No. 450; *Hubbard* ECF No. 227). On July 30, 2024, those plaintiffs filed an Unopposed Administrative Motion to Shorten Time Pursuant to Civil Local Rule 6-3 For the Hearing Of Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement (*House* ECF No. 451; *Hubbard* ECF No. 228), requesting to advance the noticed hearing date from September 5, 2024 to August 12, 13, 14 or August 19, 20, 21, or 22, 2024.

3. **28 U.S.C. § 1715 (b)(3) and (b)(4) – Proposed Notification to Class Members and Class Action Settlement Agreements:**

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4. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreements:** None.

5. **28 U.S.C. § 1715(b)(6) – Final Judgment:** None.

6. **28 U.S.C. § 1715(b)(7) – Estimate of Class Members:** The names and residences of all of the class members will not be known until after notice of the settlement is given and potential class members submit a Proof of Claim and Release. Accordingly, it is not feasible at this time to provide a list of class members by state of residence, a reasonable estimate of the number of class members residing in each state, or a reasonable estimate of the proportionate share of claims of class members residing in each state to the entire settlement. We respectfully refer any further inquiries regarding the potential class members to Verita Global, LLC (the “Settlement Administrator”), which is working to collect information regarding potential class members in order to provide such members with notice of the Stipulation of Settlement.

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The foregoing information is provided based on the information currently available to Defendants and is based on the status of the proceedings at the time of the submission of this notification. Should you have any questions, please do not hesitate to contact us.

Respectfully submitted,

s/ Christopher S. Yates

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August 5, 2024

**VIA CERTIFIED U.S. MAIL**

Office of the Attorney General  
700 Capital Avenue, Suite 118  
Frankfort, Kentucky 40601-3449

Re: Notice of Class Action Settlement Pursuant to 28 U.S.C. § 1715  
*In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW  
*Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW  
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2. **28 U.S.C. § 1715(b)(2) – Notice of any Scheduled Judicial Hearings:** Plaintiffs in *House* and *Hubbard* noticed a settlement hearing for September 5, 2024. (*House* ECF No. 450; *Hubbard* ECF No. 227). On July 30, 2024, those plaintiffs filed an Unopposed Administrative Motion to Shorten Time Pursuant to Civil Local Rule 6-3 For the Hearing Of Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement (*House* ECF No. 451; *Hubbard* ECF No. 228), requesting to advance the noticed hearing date from September 5, 2024 to August 12, 13, 14 or August 19, 20, 21, or 22, 2024.

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Respectfully submitted,

s/ Christopher S. Yates

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*Attorney for Defendant The Big 12 Conference, Inc.*

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August 5, 2024  
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August 5, 2024

## VIA CERTIFIED U.S. MAIL

Attorney General Liz Murrill  
 1885 North Third Street  
 Baton Rouge, LA 70802

Re: Notice of Class Action Settlement Pursuant to 28 U.S.C § 1715  
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s/ Christopher S. Yates

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August 5, 2024

## VIA CERTIFIED U.S. MAIL

Attorney General Aaron Frey  
 6 State House Station  
 Augusta, ME 04333

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6. **28 U.S.C. § 1715(b)(7) – Estimate of Class Members:** The names and residences of all of the class members will not be known until after notice of the settlement is given and potential class members submit a Proof of Claim and Release. Accordingly, it is not feasible at this time to provide a list of class members by state of residence, a reasonable estimate of the number of class members residing in each state, or a reasonable estimate of the proportionate share of claims of class members residing in each state to the entire settlement. We respectfully refer any further inquiries regarding the potential class members to Verita Global, LLC (the “Settlement Administrator”), which is working to collect information regarding potential class members in order to provide such members with notice of the Stipulation of Settlement.

LATHAM & WATKINS<sup>LLP</sup>

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The foregoing information is provided based on the information currently available to Defendants and is based on the status of the proceedings at the time of the submission of this notification. Should you have any questions, please do not hesitate to contact us.

Respectfully submitted,

s/ Christopher S. Yates

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August 5, 2024

## VIA CERTIFIED U.S. MAIL

Office of the Attorney General  
 200 St. Paul Place  
 Baltimore, MD 21202

Re: Notice of Class Action Settlement Pursuant to 28 U.S.C § 1715  
*In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW  
*Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW  
*Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS

Dear Attorney General:

Pursuant to the Class Action Fairness Act of 2005 (“CAFA”), 28 U.S.C. § 1715, we write on behalf of Defendants National Collegiate Athletic Association (“NCAA”), Pac-12 Conference (“Pac-12”), The Big Ten Conference, Inc. (“Big Ten”), The Big 12 Conference, Inc. (“Big 12”), Southeastern Conference (“SEC”), and the Atlantic Coast Conference (“ACC”) (collectively, “Defendants”) to provide the following notification of the proposed settlements in *In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW (N.D. Cal.) (“*House*”), *Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW (N.D. Cal.) (“*Hubbard*”), and *Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS (“*Carter*,” and collectively with *House* and *Hubbard*, the “Federal Actions”).

Enclosed is a CD containing the following information in a PDF format:

### 1. **28 U.S.C. § 1715(b)(1) – Complaints:**

- The Class Action Complaint (ECF No. 1), Consolidated Amended Complaint (ECF No. 164), and Second Consolidated Amended Class Action Complaint (ECF No. 448-1), filed as Exhibit 1 to the Stipulation with Proposed Order Regarding Filing of Second Consolidated Amended Class Action Complaint (ECF No. 448), filed in *House*.
- The Complaint (ECF No. 1) filed in *Hubbard*.
- The Complaint (ECF No. 1) filed in *Carter*.

2. **28 U.S.C. § 1715(b)(2) – Notice of any Scheduled Judicial Hearings:** Plaintiffs in *House* and *Hubbard* noticed a settlement hearing for September 5, 2024. (*House* ECF No. 450; *Hubbard* ECF No. 227). On July 30, 2024, those plaintiffs filed an Unopposed Administrative Motion to Shorten Time Pursuant to Civil Local Rule 6-3 For the Hearing Of Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement (*House* ECF No. 451; *Hubbard* ECF No. 228), requesting to advance the noticed hearing date from September 5, 2024 to August 12, 13, 14 or August 19, 20, 21, or 22, 2024.

3. **28 U.S.C. § 1715 (b)(3) and (b)(4) – Proposed Notification to Class Members and Class Action Settlement Agreements:**

- The *House* Plaintiffs’ Unopposed Motion for Preliminary Settlement Approval (ECF No. 450), submitted to the District Court on July 26, 2024, as well as the Stipulation of Settlement (Exhibit 1 to the Declaration of Steve W. Berman (ECF No. 450-2), ECF No. 450-3), with the following exhibits:
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4. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreements:** None.

5. **28 U.S.C. § 1715(b)(6) – Final Judgment:** None.

6. **28 U.S.C. § 1715(b)(7) – Estimate of Class Members:** The names and residences of all of the class members will not be known until after notice of the settlement is given and potential class members submit a Proof of Claim and Release. Accordingly, it is not feasible at this time to provide a list of class members by state of residence, a reasonable estimate of the number of class members residing in each state, or a reasonable estimate of the proportionate share of claims of class members residing in each state to the entire settlement. We respectfully refer any further inquiries regarding the potential class members to Verita Global, LLC (the “Settlement Administrator”), which is working to collect information regarding potential class members in order to provide such members with notice of the Stipulation of Settlement.

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The foregoing information is provided based on the information currently available to Defendants and is based on the status of the proceedings at the time of the submission of this notification. Should you have any questions, please do not hesitate to contact us.

Respectfully submitted,

s/ Christopher S. Yates

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August 5, 2024

**VIA CERTIFIED U.S. MAIL**

Office of Massachusetts Attorney General Joy Campbell  
ATTN: CAFA Coordinator/General Counsel's Office  
One Ashburton Place  
Boston, MA 02108

Re: Notice of Class Action Settlement Pursuant to 28 U.S.C § 1715  
*In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW  
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August 5, 2024

## VIA CERTIFIED U.S. MAIL

Attorney General Dana Nessel  
 525 W. Ottawa St.  
 Lansing, MI 48906

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August 5, 2024

### VIA CERTIFIED U.S. MAIL

Attorney General Keith Ellison  
 445 Minnesota Street, Suite 1400  
 St. Paul, MN 55101

Re: Notice of Class Action Settlement Pursuant to 28 U.S.C. § 1715  
*In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW  
*Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW  
*Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS

Dear Attorney General:

Pursuant to the Class Action Fairness Act of 2005 (“CAFA”), 28 U.S.C. § 1715, we write on behalf of Defendants National Collegiate Athletic Association (“NCAA”), Pac-12 Conference (“Pac-12”), The Big Ten Conference, Inc. (“Big Ten”), The Big 12 Conference, Inc. (“Big 12”), Southeastern Conference (“SEC”), and the Atlantic Coast Conference (“ACC”) (collectively, “Defendants”) to provide the following notification of the proposed settlements in *In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW (N.D. Cal.) (“*House*”), *Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW (N.D. Cal.) (“*Hubbard*”), and *Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS (“*Carter*,” and collectively with *House* and *Hubbard*, the “Federal Actions”).

Enclosed is a CD containing the following information in a PDF format:

#### 1. 28 U.S.C. § 1715(b)(1) – Complaints:

- The Class Action Complaint (ECF No. 1), Consolidated Amended Complaint (ECF No. 164), and Second Consolidated Amended Class Action Complaint (ECF No. 448-1), filed as Exhibit 1 to the Stipulation with Proposed Order Regarding Filing of Second Consolidated Amended Class Action Complaint (ECF No. 448), filed in *House*.
- The Complaint (ECF No. 1) filed in *Hubbard*.
- The Complaint (ECF No. 1) filed in *Carter*.



2. **28 U.S.C. § 1715(b)(2) – Notice of any Scheduled Judicial Hearings:** Plaintiffs in *House* and *Hubbard* noticed a settlement hearing for September 5, 2024. (*House* ECF No. 450; *Hubbard* ECF No. 227). On July 30, 2024, those plaintiffs filed an Unopposed Administrative Motion to Shorten Time Pursuant to Civil Local Rule 6-3 For the Hearing Of Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement (*House* ECF No. 451; *Hubbard* ECF No. 228), requesting to advance the noticed hearing date from September 5, 2024 to August 12, 13, 14 or August 19, 20, 21, or 22, 2024.

3. **28 U.S.C. § 1715 (b)(3) and (b)(4) – Proposed Notification to Class Members and Class Action Settlement Agreements:**

- The *House* Plaintiffs’ Unopposed Motion for Preliminary Settlement Approval (ECF No. 450), submitted to the District Court on July 26, 2024, as well as the Stipulation of Settlement (Exhibit 1 to the Declaration of Steve W. Berman (ECF No. 450-2), ECF No. 450-3), with the following exhibits:
  - [Proposed] Order (ECF No. 450-1);
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4. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreements:** None.

5. **28 U.S.C. § 1715(b)(6) – Final Judgment:** None.

6. **28 U.S.C. § 1715(b)(7) – Estimate of Class Members:** The names and residences of all of the class members will not be known until after notice of the settlement is given and potential class members submit a Proof of Claim and Release. Accordingly, it is not feasible at this time to provide a list of class members by state of residence, a reasonable estimate of the number of class members residing in each state, or a reasonable estimate of the proportionate share of claims of class members residing in each state to the entire settlement. We respectfully refer any further inquiries regarding the potential class members to Verita Global, LLC (the “Settlement Administrator”), which is working to collect information regarding potential class members in order to provide such members with notice of the Stipulation of Settlement.



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The foregoing information is provided based on the information currently available to Defendants and is based on the status of the proceedings at the time of the submission of this notification. Should you have any questions, please do not hesitate to contact us.

Respectfully submitted,

s/ Christopher S. Yates

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August 5, 2024

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Attorney General Lynn Fitch  
 550 High Street  
 Jackson, MS 39201

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Respectfully submitted,

s/ Christopher S. Yates

Christopher S. Yates  
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*Attorney for Defendant Atlantic Coast Conference*

s/ Natali Wyson

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*Attorney for Defendant The Big 12 Conference, Inc.*

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*Attorney for Defendant Southeastern Conference*

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*Attorney for Defendant The Big Ten Conference, Inc.*

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August 5, 2024

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Missouri Attorney General's Office  
Supreme Court Building  
207 W. High St.  
P.O. Box 899  
Jefferson City, MO 65102

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Respectfully submitted,

s/ Christopher S. Yates

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*Attorney for Defendant The Big Ten Conference, Inc.*

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August 5, 2024

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Office of the Attorney General  
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 P.O. Box 201401  
 Helena, MT 59620-1401

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4. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreements:** None.
5. **28 U.S.C. § 1715(b)(6) – Final Judgment:** None.
6. **28 U.S.C. § 1715(b)(7) – Estimate of Class Members:** The names and residences of all of the class members will not be known until after notice of the settlement is given and potential class members submit a Proof of Claim and Release. Accordingly, it is not feasible at this time to provide a list of class members by state of residence, a reasonable estimate of the number of class members residing in each state, or a reasonable estimate of the proportionate share of claims of class members residing in each state to the entire settlement. We respectfully refer any further inquiries regarding the potential class members to Verita Global, LLC (the



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“Settlement Administrator”), which is working to collect information regarding potential class members in order to provide such members with notice of the Stipulation of Settlement.

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The foregoing information is provided based on the information currently available to Defendants and is based on the status of the proceedings at the time of the submission of this notification. Should you have any questions, please do not hesitate to contact us.

Respectfully submitted,

s/ Christopher S. Yates

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August 5, 2024

## VIA CERTIFIED U.S. MAIL

Attorney General Mike Hilgers  
 2115 State Capitol  
 PO Box 98920  
 Lincoln, NE 68509

Re: Notice of Class Action Settlement Pursuant to 28 U.S.C. § 1715  
*In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW  
*Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW  
*Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS

Dear Attorney General:

Pursuant to the Class Action Fairness Act of 2005 (“CAFA”), 28 U.S.C. § 1715, we write on behalf of Defendants National Collegiate Athletic Association (“NCAA”), Pac-12 Conference (“Pac-12”), The Big Ten Conference, Inc. (“Big Ten”), The Big 12 Conference, Inc. (“Big 12”), Southeastern Conference (“SEC”), and the Atlantic Coast Conference (“ACC”) (collectively, “Defendants”) to provide the following notification of the proposed settlements in *In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW (N.D. Cal.) (“*House*”), *Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW (N.D. Cal.) (“*Hubbard*”), and *Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS (“*Carter*,” and collectively with *House* and *Hubbard*, the “Federal Actions”).

Enclosed is a CD containing the following information in a PDF format:

### 1. 28 U.S.C. § 1715(b)(1) – Complaints:

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- The Complaint (ECF No. 1) filed in *Hubbard*.

- The Complaint (ECF No. 1) filed in *Carter*.
2. **28 U.S.C. § 1715(b)(2) – Notice of any Scheduled Judicial Hearings:** Plaintiffs in *House* and *Hubbard* noticed a settlement hearing for September 5, 2024. (*House* ECF No. 450; *Hubbard* ECF No. 227). On July 30, 2024, those plaintiffs filed an Unopposed Administrative Motion to Shorten Time Pursuant to Civil Local Rule 6-3 For the Hearing Of Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement (*House* ECF No. 451; *Hubbard* ECF No. 228), requesting to advance the noticed hearing date from September 5, 2024 to August 12, 13, 14 or August 19, 20, 21, or 22, 2024.
3. **28 U.S.C. § 1715 (b)(3) and (b)(4) – Proposed Notification to Class Members and Class Action Settlement Agreements:**
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4. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreements:** None.
5. **28 U.S.C. § 1715(b)(6) – Final Judgment:** None.
6. **28 U.S.C. § 1715(b)(7) – Estimate of Class Members:** The names and residences of all of the class members will not be known until after notice of the settlement is given and potential class members submit a Proof of Claim and Release. Accordingly, it is not feasible at this time to provide a list of class members by state of residence, a reasonable estimate of the number of class members residing in each state, or a reasonable estimate of the proportionate share of claims of class members residing in each state to the entire settlement. We respectfully refer any further inquiries regarding the potential class members to Verita Global, LLC (the

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The foregoing information is provided based on the information currently available to Defendants and is based on the status of the proceedings at the time of the submission of this notification. Should you have any questions, please do not hesitate to contact us.

Respectfully submitted,

s/ Christopher S. Yates

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August 5, 2024

**VIA CERTIFIED U.S. MAIL**

CAFA Coordinator,  
 Office of the Nevada Attorney General  
 Bureau of Consumer Protection  
 100 N. Carson Street  
 Carson City, NV 89701

Re: Notice of Class Action Settlement Pursuant to 28 U.S.C § 1715  
*In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW  
*Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW  
*Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS

Dear Attorney General:

Pursuant to the Class Action Fairness Act of 2005 ("CAFA"), 28 U.S.C. § 1715, we write on behalf of Defendants National Collegiate Athletic Association ("NCAA"), Pac-12 Conference ("Pac-12"), The Big Ten Conference, Inc. ("Big Ten"), The Big 12 Conference, Inc. ("Big 12"), Southeastern Conference ("SEC"), and the Atlantic Coast Conference ("ACC") (collectively, "Defendants") to provide the following notification of the proposed settlements in *In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW (N.D. Cal.) ("*House*"), *Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW (N.D. Cal.) ("*Hubbard*"), and *Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS ("*Carter*," and collectively with *House* and *Hubbard*, the "Federal Actions").

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1. **28 U.S.C. § 1715(b)(1) – Complaints:**

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s/ Christopher S. Yates

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s/ Natali Wyson

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August 5, 2024

**VIA CERTIFIED U.S. MAIL**

Office of the Attorney General  
 1 Granite Place South  
 Concord, NH 03301

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August 5, 2024

**VIA CERTIFIED U.S. MAIL**

Office of The Attorney General  
 Headquarters: Richard J. Hughes Justice Complex (HJC)  
 8th Floor, West Wing  
 25 Market Street  
 Trenton, NJ 08625-0080

Re: Notice of Class Action Settlement Pursuant to 28 U.S.C. § 1715  
*In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW  
*Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW  
*Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS

Dear Attorney General:

Pursuant to the Class Action Fairness Act of 2005 (“CAFA”), 28 U.S.C. § 1715, we write on behalf of Defendants National Collegiate Athletic Association (“NCAA”), Pac-12 Conference (“Pac-12”), The Big Ten Conference, Inc. (“Big Ten”), The Big 12 Conference, Inc. (“Big 12”), Southeastern Conference (“SEC”), and the Atlantic Coast Conference (“ACC”) (collectively, “Defendants”) to provide the following notification of the proposed settlements in *In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW (N.D. Cal.) (“*House*”), *Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW (N.D. Cal.) (“*Hubbard*”), and *Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS (“*Carter*,” and collectively with *House* and *Hubbard*, the “Federal Actions”).

Enclosed is a CD containing the following information in a PDF format:

1. **28 U.S.C. § 1715(b)(1) – Complaints:**

- The Class Action Complaint (ECF No. 1), Consolidated Amended Complaint (ECF No. 164), and Second Consolidated Amended Class Action Complaint (ECF No. 448-1), filed as Exhibit 1 to the Stipulation with Proposed Order Regarding Filing of Second Consolidated Amended Class Action Complaint (ECF No. 448), filed in *House*.
- The Complaint (ECF No. 1) filed in *Hubbard*.

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2. **28 U.S.C. § 1715(b)(2) – Notice of any Scheduled Judicial Hearings:** Plaintiffs in *House* and *Hubbard* noticed a settlement hearing for September 5, 2024. (*House* ECF No. 450; *Hubbard* ECF No. 227). On July 30, 2024, those plaintiffs filed an Unopposed Administrative Motion to Shorten Time Pursuant to Civil Local Rule 6-3 For the Hearing Of Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement (*House* ECF No. 451; *Hubbard* ECF No. 228), requesting to advance the noticed hearing date from September 5, 2024 to August 12, 13, 14 or August 19, 20, 21, or 22, 2024.

3. **28 U.S.C. § 1715 (b)(3) and (b)(4) – Proposed Notification to Class Members and Class Action Settlement Agreements:**

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  - [Proposed] Order (ECF No. 450-1);
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4. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreements:** None.

5. **28 U.S.C. § 1715(b)(6) – Final Judgment:** None.

6. **28 U.S.C. § 1715(b)(7) – Estimate of Class Members:** The names and residences of all of the class members will not be known until after notice of the settlement is given and potential class members submit a Proof of Claim and Release. Accordingly, it is not feasible at this time to provide a list of class members by state of residence, a reasonable estimate of the number of class members residing in each state, or a reasonable estimate of the proportionate share of claims of class members residing in each state to the entire settlement. We respectfully refer any further inquiries regarding the potential class members to Verita Global, LLC (the

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The foregoing information is provided based on the information currently available to Defendants and is based on the status of the proceedings at the time of the submission of this notification. Should you have any questions, please do not hesitate to contact us.

Respectfully submitted,

s/ Christopher S. Yates

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August 5, 2024

**VIA CERTIFIED U.S. MAIL**

New Mexico Dept. of Justice  
 408 Galisteo Street  
 Villagra Building  
 Santa Fe, NM 87501

Re: Notice of Class Action Settlement Pursuant to 28 U.S.C. § 1715  
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4. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreements:** None.

5. **28 U.S.C. § 1715(b)(6) – Final Judgment:** None.

6. **28 U.S.C. § 1715(b)(7) – Estimate of Class Members:** The names and residences of all of the class members will not be known until after notice of the settlement is given and potential class members submit a Proof of Claim and Release. Accordingly, it is not feasible at this time to provide a list of class members by state of residence, a reasonable estimate of the number of class members residing in each state, or a reasonable estimate of the proportionate share of claims of class members residing in each state to the entire settlement. We respectfully refer any further inquiries regarding the potential class members to Verita Global, LLC (the

LATHAM & WATKINS<sup>LLP</sup>

“Settlement Administrator”), which is working to collect information regarding potential class members in order to provide such members with notice of the Stipulation of Settlement.

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Respectfully submitted,

s/ Christopher S. Yates

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*Attorney for Defendant The Big 12 Conference, Inc.*

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*Attorney for Defendant The Big Ten Conference, Inc.*

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August 5, 2024

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CAFA Coordinator  
 Office of the New York State Attorney General  
 28 Liberty Street, 15th Floor  
 New York, NY 10005

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s/ Christopher S. Yates

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s/ Robert W. Fuller

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August 5, 2024

**VIA CERTIFIED U.S. MAIL**

Attorney General Josh Stein  
 9001 Mail Service Center  
 Raleigh, NC 27699-9001

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2. **28 U.S.C. § 1715(b)(2) – Notice of any Scheduled Judicial Hearings:** Plaintiffs in *House* and *Hubbard* noticed a settlement hearing for September 5, 2024. (*House* ECF No. 450; *Hubbard* ECF No. 227). On July 30, 2024, those plaintiffs filed an Unopposed Administrative Motion to Shorten Time Pursuant to Civil Local Rule 6-3 For the Hearing Of Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement (*House* ECF No. 451; *Hubbard* ECF No. 228), requesting to advance the noticed hearing date from September 5, 2024 to August 12, 13, 14 or August 19, 20, 21, or 22, 2024.

3. **28 U.S.C. § 1715 (b)(3) and (b)(4) – Proposed Notification to Class Members and Class Action Settlement Agreements:**

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4. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreements:** None.

5. **28 U.S.C. § 1715(b)(6) – Final Judgment:** None.

6. **28 U.S.C. § 1715(b)(7) – Estimate of Class Members:** The names and residences of all of the class members will not be known until after notice of the settlement is given and potential class members submit a Proof of Claim and Release. Accordingly, it is not feasible at this time to provide a list of class members by state of residence, a reasonable estimate of the number of class members residing in each state, or a reasonable estimate of the proportionate share of claims of class members residing in each state to the entire settlement. We respectfully refer any further inquiries regarding the potential class members to Verita Global, LLC (the “Settlement Administrator”), which is working to collect information regarding potential class members in order to provide such members with notice of the Stipulation of Settlement.

LATHAM & WATKINS<sup>LLP</sup>

7. **28 U.S.C. § 1715(b)(8) – Judicial Opinions Related to the Settlement:** The Court granted the *House* Plaintiffs’ Unopposed Motion for Certification of Injunctive Relief Class on September 22, 2023 (*House* ECF No. 323), granted the *House* Plaintiffs’ Motion for Certification of Damages Classes on November 3, 2023 (*House* ECF No. 387), and issued an Order Granting the *House* Plaintiffs’ Motion to Approve Manner and Form of Class Notice (as Modified) on March 1, 2024 (*House* ECF No. 406).

The foregoing information is provided based on the information currently available to Defendants and is based on the status of the proceedings at the time of the submission of this notification. Should you have any questions, please do not hesitate to contact us.

Respectfully submitted,

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Madrid	

August 5, 2024

### VIA CERTIFIED U.S. MAIL

Attorney General Drew H. Wrigley  
 Consumer Protection and Antitrust  
 1720 Burlington Drive, Suite C  
 Bismarck, ND 58504

Re: Notice of Class Action Settlement Pursuant to 28 U.S.C § 1715  
*In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW  
*Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW  
*Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS

Dear Attorney General:

Pursuant to the Class Action Fairness Act of 2005 (“CAFA”), 28 U.S.C. § 1715, we write on behalf of Defendants National Collegiate Athletic Association (“NCAA”), Pac-12 Conference (“Pac-12”), The Big Ten Conference, Inc. (“Big Ten”), The Big 12 Conference, Inc. (“Big 12”), Southeastern Conference (“SEC”), and the Atlantic Coast Conference (“ACC”) (collectively, “Defendants”) to provide the following notification of the proposed settlements in *In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW (N.D. Cal.) (“*House*”), *Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW (N.D. Cal.) (“*Hubbard*”), and *Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS (“*Carter*,” and collectively with *House* and *Hubbard*, the “Federal Actions”).

Enclosed is a CD containing the following information in a PDF format:

#### 1. 28 U.S.C. § 1715(b)(1) – Complaints:

- The Class Action Complaint (ECF No. 1), Consolidated Amended Complaint (ECF No. 164), and Second Consolidated Amended Class Action Complaint (ECF No. 448-1), filed as Exhibit 1 to the Stipulation with Proposed Order Regarding Filing of Second Consolidated Amended Class Action Complaint (ECF No. 448), filed in *House*.
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4. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreements:** None.

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The foregoing information is provided based on the information currently available to Defendants and is based on the status of the proceedings at the time of the submission of this notification. Should you have any questions, please do not hesitate to contact us.

Respectfully submitted,

s/ Christopher S. Yates

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*Attorney for Defendant Atlantic Coast Conference*

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*Attorney for Defendant The Big 12 Conference, Inc.*

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August 5, 2024

### VIA CERTIFIED U.S. MAIL

Attorney General Dave Yost  
 James A. Rhodes State Office Tower  
 30 E. Broad St. Floor 17  
 Columbus, OH 43215

Re: Notice of Class Action Settlement Pursuant to 28 U.S.C § 1715  
*In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW  
*Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW  
*Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS

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Respectfully submitted,

s/ Christopher S. Yates

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Madrid	

August 5, 2024

## VIA CERTIFIED U.S. MAIL

Office of the Oklahoma Attorney General  
 313 NE 21st Street  
 Oklahoma City, OK 73105

Re: Notice of Class Action Settlement Pursuant to 28 U.S.C. § 1715  
*In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW  
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August 5, 2024

## VIA CERTIFIED U.S. MAIL

Attorney General Ellen F. Rosenblum  
 Oregon Department of Justice  
 1162 Court St. NE  
 Salem, OR 97301-4096

Re: Notice of Class Action Settlement Pursuant to 28 U.S.C § 1715  
*In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW  
*Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW  
*Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS

Dear Attorney General:

Pursuant to the Class Action Fairness Act of 2005 (“CAFA”), 28 U.S.C. § 1715, we write on behalf of Defendants National Collegiate Athletic Association (“NCAA”), Pac-12 Conference (“Pac-12”), The Big Ten Conference, Inc. (“Big Ten”), The Big 12 Conference, Inc. (“Big 12”), Southeastern Conference (“SEC”), and the Atlantic Coast Conference (“ACC”) (collectively, “Defendants”) to provide the following notification of the proposed settlements in *In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW (N.D. Cal.) (“*House*”), *Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW (N.D. Cal.) (“*Hubbard*”), and *Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS (“*Carter*,” and collectively with *House* and *Hubbard*, the “Federal Actions”).

Enclosed is a CD containing the following information in a PDF format:

### 1. 28 U.S.C. § 1715(b)(1) – Complaints:

- The Class Action Complaint (ECF No. 1), Consolidated Amended Complaint (ECF No. 164), and Second Consolidated Amended Class Action Complaint (ECF No. 448-1), filed as Exhibit 1 to the Stipulation with Proposed Order Regarding Filing of Second Consolidated Amended Class Action Complaint (ECF No. 448), filed in *House*.
- The Complaint (ECF No. 1) filed in *Hubbard*.

- The Complaint (ECF No. 1) filed in *Carter*.

2. **28 U.S.C. § 1715(b)(2) – Notice of any Scheduled Judicial Hearings:** Plaintiffs in *House* and *Hubbard* noticed a settlement hearing for September 5, 2024. (*House* ECF No. 450; *Hubbard* ECF No. 227). On July 30, 2024, those plaintiffs filed an Unopposed Administrative Motion to Shorten Time Pursuant to Civil Local Rule 6-3 For the Hearing Of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement (*House* ECF No. 451; *Hubbard* ECF No. 228), requesting to advance the noticed hearing date from September 5, 2024 to August 12, 13, 14 or August 19, 20, 21, or 22, 2024.

3. **28 U.S.C. § 1715 (b)(3) and (b)(4) – Proposed Notification to Class Members and Class Action Settlement Agreements:**

- The *House* Plaintiffs' Unopposed Motion for Preliminary Settlement Approval (ECF No. 450), submitted to the District Court on July 26, 2024, as well as the Stipulation of Settlement (Exhibit 1 to the Declaration of Steve W. Berman (ECF No. 450-2), ECF No. 450-3), with the following exhibits:
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4. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreements:** None.

5. **28 U.S.C. § 1715(b)(6) – Final Judgment:** None.

6. **28 U.S.C. § 1715(b)(7) – Estimate of Class Members:** The names and residences of all of the class members will not be known until after notice of the settlement is given and potential class members submit a Proof of Claim and Release. Accordingly, it is not feasible at this time to provide a list of class members by state of residence, a reasonable estimate of the number of class members residing in each state, or a reasonable estimate of the proportionate share of claims of class members residing in each state to the entire settlement. We respectfully refer any further inquiries regarding the potential class members to Verita Global, LLC (the

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“Settlement Administrator”), which is working to collect information regarding potential class members in order to provide such members with notice of the Stipulation of Settlement.

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The foregoing information is provided based on the information currently available to Defendants and is based on the status of the proceedings at the time of the submission of this notification. Should you have any questions, please do not hesitate to contact us.

Respectfully submitted,

s/ Christopher S. Yates

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August 5, 2024

## VIA CERTIFIED U.S. MAIL

Pennsylvania Office of Attorney General  
 Strawberry Square  
 Harrisburg, PA 17120

Re: Notice of Class Action Settlement Pursuant to 28 U.S.C. § 1715  
*In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW  
*Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW  
*Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS

Dear Attorney General:

Pursuant to the Class Action Fairness Act of 2005 ("CAFA"), 28 U.S.C. § 1715, we write on behalf of Defendants National Collegiate Athletic Association ("NCAA"), Pac-12 Conference ("Pac-12"), The Big Ten Conference, Inc. ("Big Ten"), The Big 12 Conference, Inc. ("Big 12"), Southeastern Conference ("SEC"), and the Atlantic Coast Conference ("ACC") (collectively, "Defendants") to provide the following notification of the proposed settlements in *In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW (N.D. Cal.) ("*House*"), *Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW (N.D. Cal.) ("*Hubbard*"), and *Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS ("*Carter*," and collectively with *House* and *Hubbard*, the "Federal Actions").

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### 1. 28 U.S.C. § 1715(b)(1) – Complaints:

- The Class Action Complaint (ECF No. 1), Consolidated Amended Complaint (ECF No. 164), and Second Consolidated Amended Class Action Complaint (ECF No. 448-1), filed as Exhibit 1 to the Stipulation with Proposed Order Regarding Filing of Second Consolidated Amended Class Action Complaint (ECF No. 448), filed in *House*.
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2. **28 U.S.C. § 1715(b)(2) – Notice of any Scheduled Judicial Hearings:** Plaintiffs in *House* and *Hubbard* noticed a settlement hearing for September 5, 2024. (*House* ECF No. 450; *Hubbard* ECF No. 227). On July 30, 2024, those plaintiffs filed an Unopposed Administrative Motion to Shorten Time Pursuant to Civil Local Rule 6-3 For the Hearing Of Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement (*House* ECF No. 451; *Hubbard* ECF No. 228), requesting to advance the noticed hearing date from September 5, 2024 to August 12, 13, 14 or August 19, 20, 21, or 22, 2024.

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4. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreements:** None.

5. **28 U.S.C. § 1715(b)(6) – Final Judgment:** None.

6. **28 U.S.C. § 1715(b)(7) – Estimate of Class Members:** The names and residences of all of the class members will not be known until after notice of the settlement is given and potential class members submit a Proof of Claim and Release. Accordingly, it is not feasible at this time to provide a list of class members by state of residence, a reasonable estimate of the number of class members residing in each state, or a reasonable estimate of the proportionate share of claims of class members residing in each state to the entire settlement. We respectfully refer any further inquiries regarding the potential class members to Verita Global, LLC (the “Settlement Administrator”), which is working to collect information regarding potential class members in order to provide such members with notice of the Stipulation of Settlement.



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Respectfully submitted,

s/ Christopher S. Yates

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August 5, 2024

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Attorney General Peter F. Neronha  
 150 South Main Street  
 Providence, RI 02903

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Respectfully submitted,

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August 5, 2024

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Attorney General Alan Wilson  
 P.O. Box 11549  
 Columbia, SC 29211

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Pursuant to the Class Action Fairness Act of 2005 (“CAFA”), 28 U.S.C. § 1715, we write on behalf of Defendants National Collegiate Athletic Association (“NCAA”), Pac-12 Conference (“Pac-12”), The Big Ten Conference, Inc. (“Big Ten”), The Big 12 Conference, Inc. (“Big 12”), Southeastern Conference (“SEC”), and the Atlantic Coast Conference (“ACC”) (collectively, “Defendants”) to provide the following notification of the proposed settlements in *In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW (N.D. Cal.) (“*House*”), *Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW (N.D. Cal.) (“*Hubbard*”), and *Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS (“*Carter*,” and collectively with *House* and *Hubbard*, the “Federal Actions”).

Enclosed is a CD containing the following information in a PDF format:

#### 1. **28 U.S.C. § 1715(b)(1) – Complaints:**

- The Class Action Complaint (ECF No. 1), Consolidated Amended Complaint (ECF No. 164), and Second Consolidated Amended Class Action Complaint (ECF No. 448-1), filed as Exhibit 1 to the Stipulation with Proposed Order Regarding Filing of Second Consolidated Amended Class Action Complaint (ECF No. 448), filed in *House*.
- The Complaint (ECF No. 1) filed in *Hubbard*.
- The Complaint (ECF No. 1) filed in *Carter*.

2. **28 U.S.C. § 1715(b)(2) – Notice of any Scheduled Judicial Hearings:** Plaintiffs in *House* and *Hubbard* noticed a settlement hearing for September 5, 2024. (*House* ECF No. 450; *Hubbard* ECF No. 227). On July 30, 2024, those plaintiffs filed an Unopposed Administrative Motion to Shorten Time Pursuant to Civil Local Rule 6-3 For the Hearing Of Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement (*House* ECF No. 451; *Hubbard* ECF No. 228), requesting to advance the noticed hearing date from September 5, 2024 to August 12, 13, 14 or August 19, 20, 21, or 22, 2024.

3. **28 U.S.C. § 1715 (b)(3) and (b)(4) – Proposed Notification to Class Members and Class Action Settlement Agreements:**

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4. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreements:** None.

5. **28 U.S.C. § 1715(b)(6) – Final Judgment:** None.

6. **28 U.S.C. § 1715(b)(7) – Estimate of Class Members:** The names and residences of all of the class members will not be known until after notice of the settlement is given and potential class members submit a Proof of Claim and Release. Accordingly, it is not feasible at this time to provide a list of class members by state of residence, a reasonable estimate of the number of class members residing in each state, or a reasonable estimate of the proportionate share of claims of class members residing in each state to the entire settlement. We respectfully refer any further inquiries regarding the potential class members to Verita Global, LLC (the “Settlement Administrator”), which is working to collect information regarding potential class members in order to provide such members with notice of the Stipulation of Settlement.

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The foregoing information is provided based on the information currently available to Defendants and is based on the status of the proceedings at the time of the submission of this notification. Should you have any questions, please do not hesitate to contact us.

Respectfully submitted,

s/ Christopher S. Yates

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August 5, 2024

## VIA CERTIFIED U.S. MAIL

Division of Consumer Protection  
 1302 E Hwy 14  
 Suite 3  
 Pierre, SD 57501-8501

Re: Notice of Class Action Settlement Pursuant to 28 U.S.C § 1715  
*In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW  
*Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW  
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Enclosed is a CD containing the following information in a PDF format:

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2. **28 U.S.C. § 1715(b)(2) – Notice of any Scheduled Judicial Hearings:** Plaintiffs in *House* and *Hubbard* noticed a settlement hearing for September 5, 2024. (*House* ECF No. 450; *Hubbard* ECF No. 227). On July 30, 2024, those plaintiffs filed an Unopposed Administrative Motion to Shorten Time Pursuant to Civil Local Rule 6-3 For the Hearing Of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement (*House* ECF No. 451; *Hubbard* ECF No. 228), requesting to advance the noticed hearing date from September 5, 2024 to August 12, 13, 14 or August 19, 20, 21, or 22, 2024.

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4. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreements:** None.

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6. **28 U.S.C. § 1715(b)(7) – Estimate of Class Members:** The names and residences of all of the class members will not be known until after notice of the settlement is given and potential class members submit a Proof of Claim and Release. Accordingly, it is not feasible at this time to provide a list of class members by state of residence, a reasonable estimate of the number of class members residing in each state, or a reasonable estimate of the proportionate share of claims of class members residing in each state to the entire settlement. We respectfully refer any further inquiries regarding the potential class members to Verita Global, LLC (the



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Respectfully submitted,

s/ Christopher S. Yates

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*Attorney for Defendant The Big 12 Conference, Inc.*

s/ Robert W. Fuller

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*Attorney for Defendant Southeastern Conference*

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August 5, 2024

**VIA CERTIFIED U.S. MAIL**

Attorney General Jonathan Skrmetti  
 P.O. Box 20207  
 Nashville, TN 37202

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LATHAM & WATKINS LLP

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s/ Christopher S. Yates

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s/ Robert W. Fuller

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*Attorney for Defendant The Big Ten Conference, Inc.*

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Madrid	

August 5, 2024

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Office of the Attorney General  
 PO Box 12548  
 Austin, TX 78711-2548

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6. **28 U.S.C. § 1715(b)(7) – Estimate of Class Members:** The names and residences of all of the class members will not be known until after notice of the settlement is given and potential class members submit a Proof of Claim and Release. Accordingly, it is not feasible at this time to provide a list of class members by state of residence, a reasonable estimate of the number of class members residing in each state, or a reasonable estimate of the proportionate share of claims of class members residing in each state to the entire settlement. We respectfully refer any further inquiries regarding the potential class members to Verita Global, LLC (the “Settlement Administrator”), which is working to collect information regarding potential class members in order to provide such members with notice of the Stipulation of Settlement.

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The foregoing information is provided based on the information currently available to Defendants and is based on the status of the proceedings at the time of the submission of this notification. Should you have any questions, please do not hesitate to contact us.

Respectfully submitted,

s/ Christopher S. Yates

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August 5, 2024

### VIA CERTIFIED U.S. MAIL

Attorney General Sean D. Reyes  
 PO Box 142320  
 SLC, UT 84114-2320

Re: Notice of Class Action Settlement Pursuant to 28 U.S.C § 1715  
*In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW  
*Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW  
*Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS

Dear Attorney General:

Pursuant to the Class Action Fairness Act of 2005 (“CAFA”), 28 U.S.C. § 1715, we write on behalf of Defendants National Collegiate Athletic Association (“NCAA”), Pac-12 Conference (“Pac-12”), The Big Ten Conference, Inc. (“Big Ten”), The Big 12 Conference, Inc. (“Big 12”), Southeastern Conference (“SEC”), and the Atlantic Coast Conference (“ACC”) (collectively, “Defendants”) to provide the following notification of the proposed settlements in *In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW (N.D. Cal.) (“*House*”), *Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW (N.D. Cal.) (“*Hubbard*”), and *Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS (“*Carter*,” and collectively with *House* and *Hubbard*, the “Federal Actions”).

Enclosed is a CD containing the following information in a PDF format:

#### 1. 28 U.S.C. § 1715(b)(1) – Complaints:

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2. **28 U.S.C. § 1715(b)(2) – Notice of any Scheduled Judicial Hearings:** Plaintiffs in *House* and *Hubbard* noticed a settlement hearing for September 5, 2024. (*House* ECF No. 450; *Hubbard* ECF No. 227). On July 30, 2024, those plaintiffs filed an Unopposed Administrative Motion to Shorten Time Pursuant to Civil Local Rule 6-3 For the Hearing Of Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement (*House* ECF No. 451; *Hubbard* ECF No. 228), requesting to advance the noticed hearing date from September 5, 2024 to August 12, 13, 14 or August 19, 20, 21, or 22, 2024.

3. **28 U.S.C. § 1715 (b)(3) and (b)(4) – Proposed Notification to Class Members and Class Action Settlement Agreements:**

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4. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreements:** None.

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Respectfully submitted,

s/ Christopher S. Yates

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August 5, 2024

**VIA CERTIFIED U.S. MAIL**

Attorney General Charity R. Clark  
109 State St  
Montpelier, VT 05609

Re: Notice of Class Action Settlement Pursuant to 28 U.S.C § 1715  
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s/ Christopher S. Yates

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August 5, 2024

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Office of Attorney General Jason Miyares  
 202 North 9th Street  
 Richmond, Virginia 23219

Re: Notice of Class Action Settlement Pursuant to 28 U.S.C § 1715  
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August 5, 2024

**VIA CERTIFIED U.S. MAIL**

Office of the Attorney General  
1125 Washington Street SE  
PO Box 40100  
Olympia, WA 98504-0100

Re: Notice of Class Action Settlement Pursuant to 28 U.S.C § 1715  
*In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW  
*Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW  
*Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS

Dear Attorney General:

Pursuant to the Class Action Fairness Act of 2005 ("CAFA"), 28 U.S.C. § 1715, we write on behalf of Defendants National Collegiate Athletic Association ("NCAA"), Pac-12 Conference ("Pac-12"), The Big Ten Conference, Inc. ("Big Ten"), The Big 12 Conference, Inc. ("Big 12"), Southeastern Conference ("SEC"), and the Atlantic Coast Conference ("ACC") (collectively, "Defendants") to provide the following notification of the proposed settlements in *In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW (N.D. Cal.) ("*House*"), *Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW (N.D. Cal.) ("*Hubbard*"), and *Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS ("*Carter*," and collectively with *House* and *Hubbard*, the "Federal Actions").

Enclosed is a CD containing the following information in a PDF format:

1. **28 U.S.C. § 1715(b)(1) – Complaints:**

- The Class Action Complaint (ECF No. 1), Consolidated Amended Complaint (ECF No. 164), and Second Consolidated Amended Class Action Complaint (ECF No. 448-1), filed as Exhibit 1 to the Stipulation with Proposed Order Regarding Filing of Second Consolidated Amended Class Action Complaint (ECF No. 448), filed in *House*.
- The Complaint (ECF No. 1) filed in *Hubbard*.

- The Complaint (ECF No. 1) filed in *Carter*.
2. **28 U.S.C. § 1715(b)(2) – Notice of any Scheduled Judicial Hearings:** Plaintiffs in *House* and *Hubbard* noticed a settlement hearing for September 5, 2024. (*House* ECF No. 450; *Hubbard* ECF No. 227). On July 30, 2024, those plaintiffs filed an Unopposed Administrative Motion to Shorten Time Pursuant to Civil Local Rule 6-3 For the Hearing Of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement (*House* ECF No. 451; *Hubbard* ECF No. 228), requesting to advance the noticed hearing date from September 5, 2024 to August 12, 13, 14 or August 19, 20, 21, or 22, 2024.
3. **28 U.S.C. § 1715 (b)(3) and (b)(4) – Proposed Notification to Class Members and Class Action Settlement Agreements:**
- The *House* Plaintiffs' Unopposed Motion for Preliminary Settlement Approval (ECF No. 450), submitted to the District Court on July 26, 2024, as well as the Stipulation of Settlement (Exhibit 1 to the Declaration of Steve W. Berman (ECF No. 450-2), ECF No. 450-3), with the following exhibits:
    - [Proposed] Order (ECF No. 450-1);
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4. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreements:** None.
5. **28 U.S.C. § 1715(b)(6) – Final Judgment:** None.
6. **28 U.S.C. § 1715(b)(7) – Estimate of Class Members:** The names and residences of all of the class members will not be known until after notice of the settlement is given and potential class members submit a Proof of Claim and Release. Accordingly, it is not feasible at this time to provide a list of class members by state of residence, a reasonable estimate of the number of class members residing in each state, or a reasonable estimate of the proportionate share of claims of class members residing in each state to the entire settlement. We respectfully refer any further inquiries regarding the potential class members to Verita Global, LLC (the



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“Settlement Administrator”), which is working to collect information regarding potential class members in order to provide such members with notice of the Stipulation of Settlement.

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The foregoing information is provided based on the information currently available to Defendants and is based on the status of the proceedings at the time of the submission of this notification. Should you have any questions, please do not hesitate to contact us.

Respectfully submitted,

s/ Christopher S. Yates

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August 5, 2024

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Attorney General Patrick Morrissey  
 State Capitol Complex, Bldg. 1, Rm E-26  
 1900 Kanawha Blvd. E  
 Charleston, WV 25305

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Respectfully submitted,

s/ Christopher S. Yates

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LATHAM & WATKINS<sup>LLP</sup>

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s/ Christopher S. Yates

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s/ Natali Wyson

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*Attorney for Defendant The Big Ten Conference, Inc.*

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August 5, 2024

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Wyoming Attorney General's Office  
 109 State Capitol  
 200 W. 24th Street  
 Cheyenne, WY 82002

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4. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreements:** None.

5. **28 U.S.C. § 1715(b)(6) – Final Judgment:** None.

6. **28 U.S.C. § 1715(b)(7) – Estimate of Class Members:** The names and residences of all of the class members will not be known until after notice of the settlement is given and potential class members submit a Proof of Claim and Release. Accordingly, it is not feasible at this time to provide a list of class members by state of residence, a reasonable estimate of the number of class members residing in each state, or a reasonable estimate of the proportionate share of claims of class members residing in each state to the entire settlement. We respectfully refer any further inquiries regarding the potential class members to Verita Global, LLC (the



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“Settlement Administrator”), which is working to collect information regarding potential class members in order to provide such members with notice of the Stipulation of Settlement.

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The foregoing information is provided based on the information currently available to Defendants and is based on the status of the proceedings at the time of the submission of this notification. Should you have any questions, please do not hesitate to contact us.

Respectfully submitted,

s/ Christopher S. Yates

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August 5, 2024

## VIA CERTIFIED U.S. MAIL

Department of Legal Affairs  
 Executive Office Bldg.  
 3rd Floor,  
 P.O. Box 7  
 Utulei, American Samoa 96799

Re: Notice of Class Action Settlement Pursuant to 28 U.S.C. § 1715  
*In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW  
*Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW  
*Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS

Dear Attorney General:

Pursuant to the Class Action Fairness Act of 2005 ("CAFA"), 28 U.S.C. § 1715, we write on behalf of Defendants National Collegiate Athletic Association ("NCAA"), Pac-12 Conference ("Pac-12"), The Big Ten Conference, Inc. ("Big Ten"), The Big 12 Conference, Inc. ("Big 12"), Southeastern Conference ("SEC"), and the Atlantic Coast Conference ("ACC") (collectively, "Defendants") to provide the following notification of the proposed settlements in *In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW (N.D. Cal.) ("*House*"), *Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW (N.D. Cal.) ("*Hubbard*"), and *Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS ("*Carter*," and collectively with *House* and *Hubbard*, the "Federal Actions").

Enclosed is a CD containing the following information in a PDF format:

### 1. 28 U.S.C. § 1715(b)(1) – Complaints:

- The Class Action Complaint (ECF No. 1), Consolidated Amended Complaint (ECF No. 164), and Second Consolidated Amended Class Action Complaint (ECF No. 448-1), filed as Exhibit 1 to the Stipulation with Proposed Order Regarding Filing of Second Consolidated Amended Class Action Complaint (ECF No. 448), filed in *House*.
- The Complaint (ECF No. 1) filed in *Hubbard*.

- The Complaint (ECF No. 1) filed in *Carter*.
2. **28 U.S.C. § 1715(b)(2) – Notice of any Scheduled Judicial Hearings:** Plaintiffs in *House* and *Hubbard* noticed a settlement hearing for September 5, 2024. (*House* ECF No. 450; *Hubbard* ECF No. 227). On July 30, 2024, those plaintiffs filed an Unopposed Administrative Motion to Shorten Time Pursuant to Civil Local Rule 6-3 For the Hearing Of Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement (*House* ECF No. 451; *Hubbard* ECF No. 228), requesting to advance the noticed hearing date from September 5, 2024 to August 12, 13, 14 or August 19, 20, 21, or 22, 2024.
3. **28 U.S.C. § 1715 (b)(3) and (b)(4) – Proposed Notification to Class Members and Class Action Settlement Agreements:**
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4. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreements:** None.
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6. **28 U.S.C. § 1715(b)(7) – Estimate of Class Members:** The names and residences of all of the class members will not be known until after notice of the settlement is given and potential class members submit a Proof of Claim and Release. Accordingly, it is not feasible at this time to provide a list of class members by state of residence, a reasonable estimate of the number of class members residing in each state, or a reasonable estimate of the proportionate share of claims of class members residing in each state to the entire settlement. We respectfully refer any further inquiries regarding the potential class members to Verita Global, LLC (the

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Respectfully submitted,

s/ Christopher S. Yates

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Los Angeles	Washington, D.C.
Madrid	

August 5, 2024

**VIA CERTIFIED U.S. MAIL**

Office of the Attorney General Guam  
 590 S. Marine Corps Dr., Suite 901  
 Tamuning, GU 96913

Re: Notice of Class Action Settlement Pursuant to 28 U.S.C § 1715  
*In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW  
*Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW  
*Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS

Dear Attorney General:

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s/ Christopher S. Yates

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Hong Kong	Singapore
Houston	Tel Aviv
London	Tokyo
Los Angeles	Washington, D.C.
Madrid	

August 5, 2024

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Office of the Attorney General  
 Caller Box 10007  
 Saipan, MP 96950

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*Attorney for Defendant The Big Ten Conference, Inc.*

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August 5, 2024

## VIA CERTIFIED U.S. MAIL

Office of the Attorney General  
 PO Box 9020192  
 San Juan, PR, 00902-0192

Re: Notice of Class Action Settlement Pursuant to 28 U.S.C § 1715  
*In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW  
*Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW  
*Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS

Dear Attorney General:

Pursuant to the Class Action Fairness Act of 2005 (“CAFA”), 28 U.S.C. § 1715, we write on behalf of Defendants National Collegiate Athletic Association (“NCAA”), Pac-12 Conference (“Pac-12”), The Big Ten Conference, Inc. (“Big Ten”), The Big 12 Conference, Inc. (“Big 12”), Southeastern Conference (“SEC”), and the Atlantic Coast Conference (“ACC”) (collectively, “Defendants”) to provide the following notification of the proposed settlements in *In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW (N.D. Cal.) (“*House*”), *Hubbard v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 4:23-cv-01593-CW (N.D. Cal.) (“*Hubbard*”), and *Carter v. Nat'l Collegiate Athletic Assoc. et al.*, Case No. 3:23-cv-06325-RS (“*Carter*,” and collectively with *House* and *Hubbard*, the “Federal Actions”).

Enclosed is a CD containing the following information in a PDF format:

### 1. 28 U.S.C. § 1715(b)(1) – Complaints:

- The Class Action Complaint (ECF No. 1), Consolidated Amended Complaint (ECF No. 164), and Second Consolidated Amended Class Action Complaint (ECF No. 448-1), filed as Exhibit 1 to the Stipulation with Proposed Order Regarding Filing of Second Consolidated Amended Class Action Complaint (ECF No. 448), filed in *House*.
- The Complaint (ECF No. 1) filed in *Hubbard*.
- The Complaint (ECF No. 1) filed in *Carter*.

2. **28 U.S.C. § 1715(b)(2) – Notice of any Scheduled Judicial Hearings:** Plaintiffs in *House* and *Hubbard* noticed a settlement hearing for September 5, 2024. (*House* ECF No. 450; *Hubbard* ECF No. 227). On July 30, 2024, those plaintiffs filed an Unopposed Administrative Motion to Shorten Time Pursuant to Civil Local Rule 6-3 For the Hearing Of Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement (*House* ECF No. 451; *Hubbard* ECF No. 228), requesting to advance the noticed hearing date from September 5, 2024 to August 12, 13, 14 or August 19, 20, 21, or 22, 2024.

3. **28 U.S.C. § 1715 (b)(3) and (b)(4) – Proposed Notification to Class Members and Class Action Settlement Agreements:**

- The *House* Plaintiffs’ Unopposed Motion for Preliminary Settlement Approval (ECF No. 450), submitted to the District Court on July 26, 2024, as well as the Stipulation of Settlement (Exhibit 1 to the Declaration of Steve W. Berman (ECF No. 450-2), ECF No. 450-3), with the following exhibits:
  - [Proposed] Order (ECF No. 450-1);
  - Declaration of Daniel A. Rascher (ECF No. 450-4); and
  - Declaration of Carla A. Peak Regarding Settlement Notice Program (ECF No. 450-5).
- The *Hubbard* Plaintiffs’ Notice of Motion and Unopposed Motion for Preliminary Approval of Class Action Settlement (ECF No. 227), submitted to the District Court on July 26, 2024, as well as the Stipulation of Settlement (Exhibit 1 to the Declaration of Jeffrey L. Kessler (ECF No. 227-2), ECF No. 227-3), with the following exhibits:
  - [Proposed] Order (ECF No. 227-1);
  - Exhibit 2 to the Declaration of Jeffrey L. Kessler (ECF No. 227-4);
  - Declaration of Daniel A. Rascher (ECF No. 227-5); and
  - Declaration of Carla A. Peak Regarding Settlement Notice Program (ECF No. 227-6).

4. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreements:** None.

5. **28 U.S.C. § 1715(b)(6) – Final Judgment:** None.

6. **28 U.S.C. § 1715(b)(7) – Estimate of Class Members:** The names and residences of all of the class members will not be known until after notice of the settlement is given and potential class members submit a Proof of Claim and Release. Accordingly, it is not feasible at this time to provide a list of class members by state of residence, a reasonable estimate of the number of class members residing in each state, or a reasonable estimate of the proportionate share of claims of class members residing in each state to the entire settlement. We respectfully refer any further inquiries regarding the potential class members to Verita Global, LLC (the “Settlement Administrator”), which is working to collect information regarding potential class members in order to provide such members with notice of the Stipulation of Settlement.

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7. **28 U.S.C. § 1715(b)(8) – Judicial Opinions Related to the Settlement:** The Court granted the *House* Plaintiffs’ Unopposed Motion for Certification of Injunctive Relief Class on September 22, 2023 (*House* ECF No. 323), granted the *House* Plaintiffs’ Motion for Certification of Damages Classes on November 3, 2023 (*House* ECF No. 387), and issued an Order Granting the *House* Plaintiffs’ Motion to Approve Manner and Form of Class Notice (as Modified) on March 1, 2024 (*House* ECF No. 406).

The foregoing information is provided based on the information currently available to Defendants and is based on the status of the proceedings at the time of the submission of this notification. Should you have any questions, please do not hesitate to contact us.

Respectfully submitted,

s/ Christopher S. Yates

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August 5, 2024

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 3438 Kronprindsens Gade  
 GERS Building, 2nd Floor  
 St. Thomas, VI 00802

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4. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreements:** None.
5. **28 U.S.C. § 1715(b)(6) – Final Judgment:** None.
6. **28 U.S.C. § 1715(b)(7) – Estimate of Class Members:** The names and residences of all of the class members will not be known until after notice of the settlement is given and potential class members submit a Proof of Claim and Release. Accordingly, it is not feasible at this time to provide a list of class members by state of residence, a reasonable estimate of the number of class members residing in each state, or a reasonable estimate of the proportionate share of claims of class members residing in each state to the entire settlement. We respectfully refer any further inquiries regarding the potential class members to Verita Global, LLC (the

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Respectfully submitted,

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